

Exhibit 22

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Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 C.A. No. 1:15-cv-07488-CM

-----x

4 IN RE:

5 NAMENDA DIRECT PURCHASER
6 ANTITRUST LITIGATION

7 -----x

8 1221 Avenue of the Americas
9 New York, New York

10 October 11, 2017
11 10:36 a.m.

12 *** HIGHLY CONFIDENTIAL ***

13
14 VIDEOTAPED 30(b)(6) DEPOSITION of
15 FOREST LABORATORIES (now ALLERGAN) and its
16 Representative JULIE A. SNYDER, taken by the
17 Plaintiffs, held at the aforementioned time and
18 place, before Sherri Flagg, a Registered
19 Professional Reporter, Certified LiveNote
20 Reporter, and Notary Public.

21 * * *

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<p style="text-align: right;">Page 82</p> <p>1 were some of the other things that you 2 forecasted? And I'm referring to the 3 pre-Actavis acquisition time here. 4 A. If you're asking things that I 5 forecast, I mean, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] 15 Q. I used the term previously 16 "lifecycle management." Have you heard of that 17 term before? 18 A. Yes. 19 Q. Do you have an understanding of 20 what it is? 21 A. Yes. 22 Q. Can you tell me what it is? 23 A. Lifecycle management is just, you 24 know, some -- what you would do with the drug 25 in the future in terms of other indications or</p>	<p style="text-align: right;">Page 84</p> <p>1 authorized generic topic and we're not 2 there right now. And I think that's 3 not -- she's not here to testify in her 4 individual capacity. 5 MR. LETTER: I understand that. 6 But we're here right now because of her 7 previous answers. 8 MS. McDEVITT: No, we're not. 9 We're not here right now because -- 10 (Inaudible) 11 MR. LETTER: I'm not arguing. Can 12 you have my most previous question read 13 back, please. 14 (Requested portion read.) 15 MS. McDEVITT: Objection to form, 16 outside the scope. 17 A. I think -- I mean, I'm talking 18 specifically about forecasting and, you know, I 19 think those are two different conversations 20 that we're having. We're talking about 21 forecasting versus lifecycle management so... 22 Q. I'm fine to make the distinction 23 that we're talking about lifecycle management 24 now. If that helps you answer the question. 25 MS. McDEVITT: I'm going to shut</p>
<p style="text-align: right;">Page 83</p> <p>1 things like that. 2 Q. So in your previous answer about 3 all the different things you forecasted and 4 you've had a list of things, would you consider 5 all of those things to be lifecycle management 6 techniques? 7 A. No, not all of them. 8 Q. What were some of the lifecycle 9 management techniques in the things that you 10 listed? 11 A. I probably didn't -- those weren't 12 related to lifecycle management. 13 Q. Is it fair to say that conversion 14 from the Immediate -- Namenda Immediate-Release 15 to Namenda XR would be considered a lifecycle 16 management method? 17 MS. McDEVITT: Object to form and, 18 again, I think we're getting pretty fair 19 afield from the scope of the 30(b)(6) 20 topic here. 21 MR. LETTER: I'm going based on 22 her answers. 23 MS. McDEVITT: Well, we're taking 24 it question by question but, I mean, I 25 thought we were talking about the</p>	<p style="text-align: right;">Page 85</p> <p>1 this down if we're talking about 2 lifecycle management, just be forewarned. 3 MR. LETTER: I'm asking questions 4 based on her previous answers. 5 MS. McDEVITT: No, you're not. 6 BY MR. LETTER (continuing): 7 Q. Ms. Snyder, can you answer my 8 question? I intend to move on as soon as you 9 answer this question. 10 A. Ask me -- please ask me the 11 question again. 12 MR. LETTER: Please read it back. 13 (Requested portion read.) 14 MS. McDEVITT: And I'm going to 15 object to the question and instruct the 16 witness not to answer as outside the 17 scope of the agreed-upon topics that 18 she's here to testify about today. 19 BY MR. LETTER (continuing): 20 Q. Are you going to follow your 21 counsel's instruction? 22 A. I am. 23 MR. LETTER: I'll note for the 24 record that I disagree with the 25 instruction not to answer. It's not a</p>


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1 ERRATA SHEET
 2 WITNESS: JULIE A. SNYDER
 DATE: October 11, 2017
 3 REPORTER: Sherri Flagg, Reporter
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 PAGE/LINE(S)/ CHANGE REASON
 5 _____/_____/_____
 6 _____/_____/_____
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 19 Subscribed and Sworn to before me this _____ day
 20 of _____, 2017.
 21
 22 NOTARY PUBLIC _____
 23 MY COMMISSION EXPIRES _____
 24
 25

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1 CERTIFICATION
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 3
 4 I, Sherri Flagg, a Certified
 5 Professional Reporter, Certified LiveNote
 6 Reporter, and a Notary Public, do hereby
 7 certify that the foregoing witness, JULIE A.
 8 SNYDER, was duly sworn on the date indicated
 9 and that the foregoing is a true and accurate
 10 transcription of my stenographic notes.
 11 I further certify that I am not
 12 employed by nor related to any party to this
 13 action.
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 19
 20 Sherri Flagg, Reporter
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